

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

**IN RE: ORAL PHENYLEPHRINE  
MARKETING AND SALES PRACTICES  
LITIGATION**

**MDL No. 1:23-md-3089-BMC**

**This Document Relates to  
ALL CASES**

**CONSENSUS PLAINTIFFS' MOTION FOR AN ORDER APPOINTING PLAINTIFFS'  
PROPOSED LEADERSHIP STRUCTURE AND APPOINTING INTERIM CLASS  
COUNSEL**

Consensus Plaintiffs, on behalf of all Plaintiffs' counsel, respectfully submit this Motion for an Order Appointing Plaintiffs' Proposed Leadership Structure and Appointing Interim Class Counsel. For the reasons set forth in the accompanying memorandum of law, Consensus Plaintiffs respectfully request that the Court grant their motion, appoint their proposed leadership structure, and grant such other and further relief as the Court deems just, proper and appropriate under the circumstances.

Dated: February 9, 2024

Respectfully submitted,

/s/ Michael A. London

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*Plaintiffs' Proposed Executive Committee and  
Proposed Interim Class Counsel*